

1                                   **IN THE UNITED DISTRICT COURT FOR THE**  
2                                   **EASTERN DISTRICT OF PENNSYLVANIA**

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4                   **IN RE:**

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6                   National Football League Players’  
7                   Concussion Injury Litigation

No. 2:12-md-02323-AB

MDL No. 2323

**MOTION FOR LEAVE TO APPEAR  
TELEPHONICALLY AT THE  
ORGANIZATIONAL MEETING  
FOR ALL OPT OUT PLAINTIFFS  
SCHEDULED FOR MARCH 27, 2017**

Civ. Action No. 13-cv-4549

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14                   Plaintiffs LEWIS BUSH, deceased by his Successor in Interest DEE BUSH;  
15                   DEE BUSH an individual; DANIELLE BUSH, and individual; LEWIS BUSH, Jr.,  
16                   a minor, by his Guardian ad Litem, ELIZABETH FOX; and MAKAI BUSH, a  
17                   minor, by her Guardian ad Litem CLEO BUSH (hereinafter “Plaintiffs”); hereby  
18                   move this Court for an order granting leave for Neal A. Markowitz of Thorsnes  
19                   Bartolotta McGuire LLP, counsel for Plaintiffs, to appear telephonically for the  
20                   Organizational Meeting for all Opt Out Plaintiffs scheduled for **March 27, 2017, at**  
21                   **10:00 a.m.** In support hereof, Plaintiffs state:

22                   1.       This Court has set **March 27, 2017, at 10:00 a.m.**, for the  
23                   Organizational Meeting for all Opt Out Plaintiffs.

24                   2.       Mr. Markowitz is a resident of San Diego County, California.

25                   3.       Plaintiffs respectfully request that this Court permit Mr. Markowitz to  
26                   appear telephonically to avoid the time and expense associated with traveling to  
27                   Philadelphia, Pennsylvania, from San Diego, California.  
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WHEREFORE, Plaintiffs respectfully request Mr. Markowitz be permitted to appear by telephone at the meeting scheduled for **March 27, 2017, at 10:00 a.m.**

Dated: February 28, 2017

THORSNES BARTOLOTTA MCGUIRE LLP

By: /s/ Neal A. Markowitz

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*Certificate of Service*

On February 28, 2017, I electronically filed a copy of the foregoing document through the CM/ECF system for the United States District Court for the Eastern District of Pennsylvania, which will send a notice of electronic filing to all counsel of record and make it available for viewing and downloading from the CM/ECF system.

Bv: /s/ Neal A. Markowitz

Neal A. Markowitz

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